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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 UNITED STATES of AMERICA and THE
17 STATE of CALIFORNIA, *ex rel.*,
18 SHELBY EIDSON,

19 *Plaintiffs,*

20 vs.

21 AURORA LAS ENCINAS LLC, LINDA
22 PARKS, SIGNATURE HEALTHCARE
23 SERVICES LLC, AND DOES 1
THROUGH 10, jointly and severally,

24 *Defendants.*
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Case No.: 2:10-cv-1031 JAK (RZx)

**EX PARTE APPLICATION TO
EXTEND THE TIME FOR
CONCLUSION OF EXPERT
DISCOVERY ONE WEEK TO MAY
17, 2013; DECLARATION OF MARK
ALLEN KLEIMAN**

Expert Discovery Cut-off Date: May 10,
2013

Pretrial Conference Date: June 10, 2013

Trial Date: June 25, 2013

EX PARTE APPLICATION TO EXTEND THE TIME FOR CONCLUSION OF EXPERT

DISCOVERY ONE WEEK TO MAY 17, 2013.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Local Rule 7-19, Relator/Plaintiff Shelby Eidson, hereby applies ex parte for an order to extend the time for conclusion of expert discovery one week to May 17, 2013, so that Relator's expert, Dr. Neal Adams, can be deposed.

Good cause exists for this request. The request to extend the expert discovery cutoff is necessary as Relator's expert, Dr. Neal Adams, is unavailable until May 11, 2013.

This application is made ex parte because of the immediacy of the expert discovery cutoff. The application is made in good faith and with no improper purpose. If Plaintiff was to submit a regularly noticed Motion to Extend the Expert Discovery Cutoff, it would be impossible to have the matter heard prior to the passing of the current May 10, 2013, deadline for Expert Discovery. Thus, the Court is respectfully requested to consider this application on an ex parte basis and for the reasons set forth above.

This ex parte application is based on this Notice, the Declaration of Mark Allen Kleiman, all pleadings and papers on file herein, all matters of which the Court may take judicial notice, and such oral argument as the Court might entertain at a hearing on this application.

Counsel for Defendants have been notified of the scheduling issue regarding Dr. Adams and have graciously agreed not to oppose Relator's request for a one week extension to the expert discovery cutoff. Furthermore, Counsel for Defendant's have agreed to a May 17, 2013 date to hold the deposition of Dr. Neal Adams. Counsel for Defendants are Debra Spicer, Alan Gilchrist and Patric Hooper. Pursuant to L.R. 7-19, counsel's business contact information is as follows:

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DISCOVERY ONE WEEK TO MAY 17, 2013.

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Dated: May 1, 2013

DISABILITY RIGHTS LEGAL CENTER

By: /s/Richard Diaz

Richard Diaz
Attorney for Plaintiff

EX PARTE APPLICATION TO EXTEND THE TIME FOR CONCLUSION OF EXPERT

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